

# EXHIBIT 2002

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., AND LG  
ELECTRONICS MOBILECOMM U.S.A, INC.

Petitioners

v.

CYPRESS SEMICONDUCTOR CORP.

Patent Owner

PETITION

To Institute an *Inter Partes* Review for U.S. Patent No. 8,004,497

*under*

*37 C.F.R. § 42.100 et seq.*

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

**TABLE OF CONTENTS**

TABLE OF AUTHORITIES ..... iv

EXHIBIT LIST ..... vi

I. § 42.22(a)(1) — A STATEMENT OF THE PRECISE RELIEF REQUESTED ..... 1

II. INTRODUCTION ..... 1

III. § 42.104(a) – GROUNDS FOR STANDING ..... 2

IV. MANDATORY NOTICES ..... 3

V. § 42.104(b) – IDENTIFICATION OF CHALLENGES ..... 4

    A. § 42.104(b)(1)-(2)—Claims, Statutory Grounds, and Prior Art ..... 4

    B. § 42.104(b)(3)—How the Challenged Claims Are To Be Construed ..... 6

VI. SUMMARY OF THE '497 PATENT AND ITS PROSECUTION HISTORY ..... 6

    A. The '497 Patent ..... 6

    B. Prosecution History ..... 9

VII. § 42.104(b)(4) – HOW THE CONSTRUED CLAIMS ARE UNPATENTABLE ..... 11

    A. Ground #1: Claims 1 and 3 of the '497 Patent are Invalid under 35 U.S.C. § 102 over Boie ..... 11

    B. Ground #2: Claims 2 and 4 of the '497 Patent are Obvious under 35 U.S.C. § 103(a) over Boie and Piguet ..... 18

    C. Ground #3: Claims 1-4 of the '497 Patent are Obvious under 35 U.S.C. § 103(a) over the APA, Hristov, and Piguet ..... 28

D. Ground #4: Claims 1-4 of the '497 Patent are Obvious under 35  
U.S.C. § 103(a) over Matsushita and Piguet.....46

VIII. CONCLUSION.....60

**TABLE OF AUTHORITIES**

**Cases**

*In re Am. Acad. of Sci. Tech. Ctr.*,  
367 F.3d 1359 (Fed. Cir. 2004).....6

*Multiform Dessicants, Inc. v. Medzam, Ltd.*,  
133 F.3d 1473 (Fed. Cir. 1998).....6

*York Prods., Inc. v. Central Tractor Farm & Family Ctr.*,  
99 F.3d 1568 (Fed. Cir. 1996).....6

**Statutes**

35 U.S.C. § 102.....10

35 U.S.C. § 102(b) ..... 1, 4, 9, 10

35 U.S.C. § 102(e) .....5

35 U.S.C. § 103(a) ..... 9, 18, 28, 46

35 U.S.C. § 103(a)(Pre-AIA)..... 1, 4, 5

35 U.S.C. § 311 .....1

35 U.S.C. § 312.....1

35 U.S.C. § 313.....1

35 U.S.C. § 314.....1

35 U.S.C. § 315.....1

35 U.S.C. § 316.....1

35 U.S.C. § 317.....1

35 U.S.C. § 318.....1

35 U.S.C. § 319.....1

**Rules**

37 C.F.R. § 42.100 .....1

37 C.F.R. § 42.100(b) .....6

37 C.F.R. § 42.101 .....2

37 C.F.R. § 42.101(a).....3

37 C.F.R. § 42.101(b) .....3

37 C.F.R. § 42.101(c).....3

37 C.F.R. § 42.104(a).....2

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.